

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	)	
	)	
LTL MANAGEMENT LLC,	)	Lead BK Case: 23-12825-MBK
	)	
Debtor.	)	

**AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' JOINDER TO MOTION TO  
DISMISS THE SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT AND  
REPLY IN SUPPORT OF MOTION FILED BY THE OFFICIAL COMMITTEE OF  
TALC CLAIMANTS**

The Ad Hoc Group of Mesothelioma Claimants,<sup>1</sup> through undersigned counsel and pursuant to Section 1112(b) of the Bankruptcy Code and Rule 9011 of the Bankruptcy Rules, respectfully moves this Court to Dismiss LTL Management's Petition. In the interests of judicial economy, the Ad Hoc Group adopts and hereby incorporates by reference all arguments and evidence contained in the Motion to Dismiss filed by the Official Committee of Talc Claimants (Dkt. 286) and its Reply (to be filed).

Respectfully submitted:

**MAUNE RAICHLE HARTLEY  
FRENCH & MUDD, LLC**

*/s/ Clayton L. Thompson*

---

Clayton L. Thompson, Esq.

---

<sup>1</sup> The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, and Christine Woodfin, all mesothelioma claimants.

cthompson@mrhfmlaw.com  
MAUNE RAICHLE HARTLEY  
FRENCH & MUDD, LLC  
150 W. 30<sup>th</sup> Street, Suite 201  
New York, NY 10001  
(800) 358-5922  
*Attorneys for Mesothelioma Claimants  
Katherine Tollefson, Sandra Weathers,  
Mary Jackson, Elizabeth Meikle, Marzena Zachara,  
Robert Radin, and Christine Woodfin*

**COONEY & CONWAY**

*/s/ Kathy Byrne*

---

Kathy Byrne, Esq.  
kbyrne@cooneyconway.com  
120 N. LaSalle Street, Suite 3000  
Chicago, Illinois 60602  
Tel: (312) 236-6166  
*Attorneys for Mesothelioma Claimant Giovanni Sosa  
\*Admitted Pro Hac Vice*

**DEAN OMAR BRANHAM SHIRLEY, LLP**

*/s/ J. Bradley Smith*

---

J. Bradley Smith, Esq.  
Bsmith@dobslegal.com  
302 N. Market Road  
Suite 300  
Dallas, Texas 75202  
Tel: (214) 722-5990  
*Attorneys for Mesothelioma Claimant Evan Plotkin  
\*Admitted Pro Hac Vice*

**LEX NOVA LAW, LLC**

*/s/ E. Richard Dressel*

---

E. Richard Dressel, Esq.  
rdressel@lexnovalaw.com  
10 E. Stow Road, Suite 250  
Marlton, New Jersey 08053  
Tel: (856) 382-8211

*Attorneys for Mesothelioma Claimants Evan Plotkin and Giovanni Sosa*